

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GM CASTING HOUSE INC.)	Case No. 1:24-cv-01821
)	
Plaintiff,)	
)	JOINT STATUS REPORT
v.)	
)	
FOREVER COMPANIES, INC.)	
)	
Defendant.)	
)	
)	
)	

Pursuant to this Court’s July 18, 2024 Minute Order (ECF No. 20), Plaintiff GM Casting House Inc. (“GM”) and Defendant Forever Companies, Inc. d/b/a/ Diamond Nexus (“Diamond Nexus”) (collectively, “the Parties”) submit the following joint status report “setting forth what discovery has been completed, what discovery remains, and whether any discovery disputes require the Court’s attention.” Pursuant to the Court’s Minute Order, the Parties also report “whether they are mutually interested in a referral to the assigned Magistrate Judge for a settlement conference in light of defendant’s recent settlement proposal to plaintiff.”

1. Completed Discovery

GM and Diamond Nexus exchanged initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on June 14, 2024.

GM served its first sets of interrogatories and requests for production on Diamond Nexus on July 12, 2024. Diamond Nexus served its first sets of interrogatories and requests for production on GM on July 15, 2024. In light of ongoing settlement discussions, the Parties mutually agreed to extend their respective deadlines to respond to the discovery requests by 30 days. Diamond Nexus’ responses are now due September 11, 2024, and GM’s responses are now due September 13, 2024.

2. Remaining Discovery

GM anticipates serving additional interrogatories and requests for production on Diamond Nexus and to take deposition(s) of Diamond Nexus after GM receives Diamond Nexus’

responses to the first sets of written discovery. GM also intends to serve requests for admission on Diamond Nexus in the next several months. Depending on Diamond Nexus' responses to GM's discovery, GM also anticipates third party discovery will be prepared and served. Additionally, GM anticipates expert discovery will be necessary.

Diamond Nexus likewise anticipates serving additional interrogatories and requests for production on GM and to take deposition(s) of GM after Diamond Nexus receives GM's responses to the first sets of written discovery. Diamond Nexus likewise intends to serve requests for admission on GM in the next several months. Depending on GM's responses to Diamond Nexus' discovery, Diamond Nexus also anticipates third party discovery may be necessary. Diamond Nexus also anticipates expert discovery will be necessary.

3. Discovery Disputes

At this time, there are no discovery disputes requiring the Court's attention.

4. Consent and Settlement Discussions

Settlement discussions remain ongoing. The parties are mutually interested in a referral to the assigned Magistrate Judge for a settlement conference.

DATED: August 21, 2024

Tucker Ellis LLP

By:/s/ Nathan T. Newman

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DATED: August 21, 2024

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